

IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT
OF ALABAMA

Courtney Boyd 2001 APR -4 A 10:34

VS. CV-2:06-CV-511-WKW
Dr. Darbouze et.al.

MOTION TO IDENTIFY Jane
Doe In Original Complaint

Comes Now, The Plaintiff, Courtney Boyd, moves
into this Honorable Court as follows: To identify
Jane Doe in his Complaint filed on 6-8-06. The
Plaintiff Submit the following:

1. The Plaintiff was unable to name all of the
Defendant in his original Complaint filed on
6-08-06.
2. The Plaintiff will like to identify Nurse Susanne
Bush. This nurse has continue to Retaliated
and Denie the Plaintiff proper medical care.
3. See The Amend the attached Complaint against
Nurse Bush.

Page 2

Amended Complaint Of Jane Doe

On 3-26, 2007, I, The Plaintiff, was in B-2-40, When nurse Bush came Pass given out Pills. I told her that I could not move, and I have been unable to get up off the floor, and I had to urine on myself, because nurse Bush would not help me out. I, was put into B-2-40, because I got wrote up by nurse Bush, and I told Lt. Mary Ann Lee, and Sgt. Marcia Scott, both wrote me up, because I said I don't want to go into C-1, because I don't have no write up. I, was put into B-2-40 in the floor, because the cell was only made for two inmate, which was already in the cell. Because I was on the floor, ~~was~~ whose lower body went out and I was unable to get up on March 24, 25, 26, I don't get any help until March 27, 2007, when I went to sick call. Because my Lower Back stop hurting, and I was able to get up off the floor. The Officer working lock up said that they all called the HCU, but the nurse work not help me. The Defendants denied the Plaintiff proper medical care, Constitutes a 8th & 14th Amendment Violation, and their Negligence acted, caused the Plaintiff to suffer a great deal of Sori's Pain and made me look and feel like a fool. "See Exhibit A"

As a result the Plaintiff was force to stay on the floor unable to move for 72 hour, and was force to urine on his self. The Plaintiff was prevented from Transacting his Business, and suffered great deal of pain of the body and mind.

The Plaintiff request 25,000.00 Judgment against the defendants and Court Cost.

As stated in his Original Complaint this Court has jurisdiction under 42 U.S.C. 1331(a) & 1343. This Court has supplemental jurisdiction over state torts claims under 28 U.S.C. 1337.

Wherefore, The plaintiff prays that this honorable Court will grant this motion and order the Defendant to file an answer.

Craig Park

Certif. Certificate OF Service

I hereby Certify that I have served a copy of the Defendants Counsel, by placing it into Easterling Court, Fac. Ma, 1136X March 28, 2007.

Craig Park

Page 3